

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

FILED
NOV 23 2009

CLERK

UNITED STATES OF AMERICA,

Case Number MJ 09-46

Plaintiff,

CRIMINAL COMPLAINT

vs.

Sex Trafficking of a Child

BRANDON QUINCY THOMPSON, aka
"Terence Maceo Clay, Jr.," aka "Kadafi,"
aka, "Hanee Rashid King," aka "Hanee Rasid
King"; MEGAN MARIE HAYES,

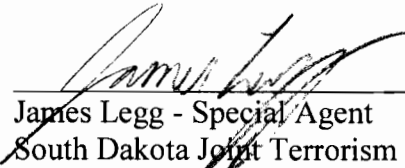
18 U.S.C. § 1591

Defendants.

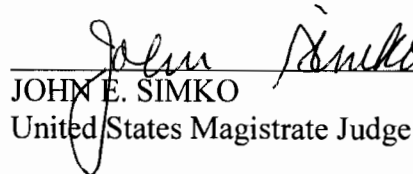
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

On or about between April 1, 2009, and July 31, 2009, in the District of South Dakota and elsewhere, defendants Brandon Quincy Thompson, aka Terence Maceo Clay, Jr., aka Kadafi, aka Hanee Rashid King, aka Hanee Rasid King, and Megan Marie Hayes did knowingly and intentionally recruit, entice, harbor, transport, provide and obtain by any means a person, to wit, Child Victim #1, whose identity is known and who had not attained the age of 18 years during the relevant time period, in and affecting interstate commerce, and did benefit financially and by receiving a thing of value from participation in a venture engaged in such acts, knowing that Child Victim #1 had not yet attained the age of 18, and having had a reasonable opportunity to observe Child Victim #1, knowing that Child Victim #1 would be caused to engage in a commercial sex act, in violation of 18 U.S.C. §§ 1591(a)(1), 1591(a)(2), 1591(b)(2).

I further state that I am a Special Agent employed by the South Dakota Division of Criminal Investigation, assigned to the Sioux Falls, South Dakota Joint Terrorism Task Force, and a Special Deputy United States Marshal, and that this complaint is based on the facts set forth in the affidavit filed herewith.


James Legg - Special Agent
South Dakota Joint Terrorism Task Force

Sworn to before me and subscribed in my presence on NOV 21, 2009 at
Sioux Falls, South Dakota. (date)


JOHN E. SIMKO
United States Magistrate Judge